

### REMARKS

Reconsideration and allowance of this application are respectfully requested in light of the foregoing amendments and the following remarks.

#### Claim Status

Claims 1 - 12 are pending. Claim 7 is amended.

#### §112 Rejection

Claim 5 is rejected under §112, second paragraph. The claim is not confusing. Claim 5, dependent from claim 1, further defines the "model" element of claim 1. As explained in the specification, a model is used to simulate the behavior of real world systems, and as such, may need a database to hold information about or for the model. Claim 5 makes clear that the model can include a database. Accordingly, claim 5 is not indefinite.

#### §102 Rejection

Claims 1 - 12 are rejected as anticipated by Notten (cited by Applicant in the specification at pages 5 - 6, bridging paragraph). Applicant respectfully disagrees for the following reasons.

Notten discloses a battery management system, i.e., a system to let the battery user know the "state of charge" (SoC) of the battery and for controlling the charging and discharging of the

battery. (Notten, Column 2, lines 35 - 45) This system uses a battery model based upon the actual behavior (empirical data) of the battery. This empirical model looks not only at the SoC of the battery, but also the temperature dependence of the battery's behavior. (Notten, Column 2, lines 46 - last line) Nowhere does Notten mention the use of 'an interface adapted to hide the model.'

The instant invention, as claimed in independent claims 1 and 7, specifically recites 'an interface adapted to hide the model.' This is essential to the invention. By hiding the model from the customer, the battery developer maintains their proprietary information/parameters, and thus, can share the benefits of their model without risking the loss of their information.

To anticipate, the reference must show each and every element of the claimed invention. Since Notten does not mention 'hiding the model,' it cannot anticipate the claimed invention.

Therefore, the §102 rejection must be removed.

Conclusion

In view of the foregoing, Applicant respectfully requests an early Notice of Allowance in this application.

Respectfully submitted,



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